
From: garry waldeck
Sent: Friday, October 23, 2020 9:45 AM
To: MORASH, MELANIE
Subject: Olin Proposed Plan

The Department of Environmental Protection (MassDEP) has reviewed the Proposed Plan and the selected remedy recommended by the U.S. Environmental Protection Agency (EPA) for the Olin Chemical Superfund Site dated August 2020. For the reasons described below, MassDEP supports the proposed remedy for the Site.

The remedy set forth in the Proposed Plan is a comprehensive remedy for Operable Unit (OU)1 and OU2 that utilizes excavation and source control components to address unacceptable risks from exposure to soil / sediment and surface water contamination at the OU1 and OU2 portions of the Site. The remedy includes source control measures to address contaminated soil and protect human health and the environment by eliminating, reducing, or controlling exposures to human and environmental receptors from direct contact, incidental ingestion, or inhalation of contaminated soil. In addition, the remedy will prevent migration of contaminants to groundwater and/or surface water. In addition the Interim Action for OU3 is a mass removal action and will be a productive first step to groundwater restoration. The components to the remedy presented in the Proposed Plan are:

- Construct and operate new extraction and treatment systems to remove Dense Aqueous Phase Liquid (DAPL) and highly contaminated groundwater to reduce the mass and further migration of Site contaminants in groundwater;
- Construct and operate a new extraction system to capture contaminated groundwater and Light Non-Aqueous Phase Liquid (LNAPL) flowing into the surface waters referred to as the East, South, and Off-Property West Ditch Streams, which includes multi-phase extraction (MPE) wells to extract groundwater, LNAPL, and soil vapor; and treat the recovered LNAPL via oil/water separation, the soil vapor via granular activated carbon (GAC), and the captured groundwater via the same treatment system as for highly contaminated groundwater;
- Construct and maintain caps and cover systems on areas of soil contamination that pose an unacceptable ecological risk on the Olin Corporation (Olin) property (Property);
- Construct and maintain a multi-layer impermeable cap over the feature known as the “Containment Area” on the Property to prevent leaching and prevent unacceptable ecological risks;
- Excavate approximately 4,000 cubic yards of contaminated wetland soil and sediment and dispose of off-site at an appropriate approved facility, and restore the wetlands and floodplain as needed;
- Prevent future exposure to trimethylpentenes (TMPs) that may pose inhalation risks (via vapor intrusion) by requiring additional evaluations and/or mitigation measures such as vapor barriers or sub-slab systems as needed;
- Operate and maintain any new and existing remedy infrastructure components;
- Continue studies to close remaining data gaps, including an improved characterization of bedrock topography and further delineation of the horizontal and vertical extent of groundwater contamination;
- Evaluate long-term groundwater cleanup options, leading to the selection of a final cleanup plan for the Site;
- Implement land use restrictions (called “Institutional Controls”) to protect the public health and the remedy where unrestricted use standards are not achieved; and
- Conduct long-term groundwater and surface water monitoring and periodic reviews, at a minimum, every five years to assess protectiveness of the remedy.

MassDEP supports the selected remedy as it is a comprehensive approach for OU1 and OU2 and an appropriate Interim Action for OU3. The selected remedies addresses all current and potential future risks caused by OU1 and OU2 and the Interim Action OU3 is a good first step toward groundwater restoration.

Garry Waldeck
MassDEP